

UNITED STATES DISTRICT COURT

for the

Central District of California

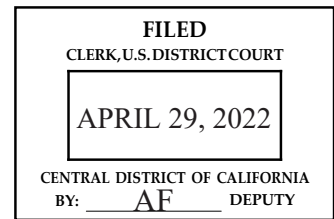
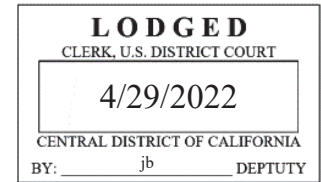
United States of America

v.

ERIK CISNEROS,

Defendant

Case No. 2:22-mj-01685 -duty

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 22, 2022, in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 2114(a)

Offense Description

Robbery of United States Mail and Property

This criminal complaint is based on these facts:

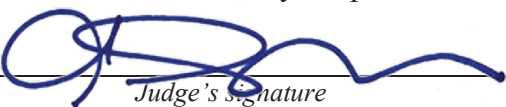
Please see attached affidavit.☒ Continued on the attached sheet./s/ Michael Durocher

Complainant's signature

Michael Durocher, USPI Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: April 29, 2022City and state: Los Angeles, California


Judge's signature
Hon. Alka Sagar, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Michael Durocher, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Erik Cisneros ("CISNEROS") for a violation of Title 18, United States Code, Section 2114(a) (Robbery of United States Mail and Property).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

II. BACKGROUND OF AFFIANT

3. I am a United States Postal Inspector assigned to the Los Angeles Division of the United States Postal Inspection Service ("USPIS") and have been so employed since April 2017. I am currently assigned to the Los Angeles Mail Theft Team, domiciled in Los Angeles, California, which investigates violations of Federal law, including identity theft, mail theft, wire fraud, mail fraud and bank fraud.

4. I received a Bachelor of Arts Degree in History and Political Science from the University of Mary Washington in 2007. I received twenty weeks of federal law enforcement training at the Federal Law Enforcement Training Center in Artesia, New Mexico and the Federal Air Marshal Academy in New Jersey. I served as a Federal Air Marshal with the Federal Air Marshal Service for approximately seven years. I received twelve weeks of Basic Inspector Training at the Inspection Service's training academy in Potomac, Maryland, a federally accredited law enforcement academy. The training covered various aspects of federal law enforcement, including the investigation of the Subject Offenses.

5. During my employment as a Postal Inspector, I have participated in investigations involving the theft of mail, identity theft, bank fraud, mail fraud, and wire fraud. I have interviewed witnesses and cooperating individuals regarding theft of mail, identity theft, bank fraud, mail fraud, Arrow key theft and wire fraud, and have read official reports of other agents and officers regarding such interviews. I have also been a case agent in charge of specific investigations involving identity theft, mail theft, bank fraud, and wire fraud.

6. Through my training and experience, I have learned that people who steal genuine and counterfeit United States Postal Service Arrow keys use them to access mailboxes and mail collection boxes to steal mail to further identity theft, access device fraud, and bank fraud schemes.

III. SUMMARY OF PROBABLE CAUSE

7. On April 22, 2022, a United State Postal Service ("USPS") employee was delivering mail to the residence at 715 North Alpine Drive, Beverly Hills, California 90210 when a man, later identified as CISNEROS, brandished a knife, and told the USPS employee to "give me your arrow keys." The USPS employee gave CISNEROS her USPS keys and CISNEROS fled on foot. The USPS employee stated that the man was an approximately twenty-year-old, Hispanic male that wore a black sweatshirt and black pants.

8. Surveillance footage showed the robber flee the area and enter a black Toyota Camry (the "Camry"), which is registered to CISNEROS's father, A.C., at an apartment in Chatsworth, California that he shares with CISNEROS, who is 23 years old. On April 27, 2022, Beverly Hills Police Department ("BHPD") officers went to the apartment, saw the Camry there, and spoke to the apartment manager, who confirmed that A.C. and CISNEROS lived there, and who identified CISNEROS as the individual shown in the surveillance footage of the robbery. That night, BHPD officers executed a search warrant at the apartment and found clothing matching that worn by the robber, a folding knife, two USPS Arrow keys, a key to a postal truck, and miscellaneous mail and debit cards in names not associated with CISNEROS or A.C. The next day, in a Mirandized interview, CISNEROS admitted that he stole the two Arrow keys and the LLV key from the USPS employee on April 22, 2022.

IV. STATEMENT OF PROBABLE CAUSE

9. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Robbery of USPS Employee

10. On April 22, 2022, a USPS employee was delivering mail to the residence at 715 North Alpine Drive, Beverly Hills, California 90210 when a man, later identified as CISNEROS, brandished a knife, and told the USPS employee to "give me your arrow keys." The USPS employee gave CISNEROS her USPS keys and CISNEROS fled on foot.

11. When US Postal Inspectors interviewed the USPS employee, the USPS employee stated that CISNEROS was an approximately twenty-year-old, Hispanic male that wore a black sweatshirt and black pants. In addition, the USPS employee stated that CISERNOS was approximately 5'8" tall, thin build, with brown eyes and curly black hair. The USPS employee said CISNEROS stole two USPS Arrow keys, one USPS Modified Arrow Lock (MAL) key, and LLV key. The USPS employee stated the serial numbers for the Arrow keys were "31" and "78" and the serial number for the MAL key was "D11."

B. Surveillance Video of the Robbery

12. Between April 22, 2022, and April 25, 2022, BHPD officers recovered and reviewed video surveillance footage of the robbery and CISNEROS fleeing the area. On the video, the officers saw CISNEROS approach the USPS employee in front of 715 North Alpine Drive, while CISNEROS held an item in his right

hand that appeared to be a knife. After a moment, the video shows the USPS employee withdrew an item from her pocket and gave the item to CISNEROS. CISNEROS held onto the item and fled on foot.

13. Surveillance video then shows that CISNEROS ran on foot through an alley way at the 800 block of North Foothill Road. The video shows that CISNEROS entered a black Toyota Camry with California registration 6SCV418 (the Camry), which was parked in the alley way off North Foothill Road and drove out of the camera's view. The video shows that CISNEROS was wearing a black hooded sweatshirt, black sweatpants, and black Nike shoes with a large Nike "Swoosh" logo on the sides of the shoes.

C. Identification of CISNEROS and Search of 10340 Canoga Ave Apt. 251, Chatsworth, California 91311

14. By using law enforcement databases, BHPD officers discovered that the Camry was registered to A.C. at 10340 Canoga Ave Apt. 251, Chatsworth, California 91311 (the "Apartment"). In addition, law enforcement researched open-source databases and discovered that A.C. had a twenty-three-year-old son named CISNEROS that was similar in age and description as the robbery suspect.

15. On April 27, 2022, BHPD officers identified the Camry in the parking garage at the Apartment. BHPD officers contacted the building manager and the building manager confirmed that A.C. and CISNEROS lived in the Apartment. The officers presented images of the robbery suspect to the building manager

and the building manager positively identified the suspect as CISNEROS. The building manager told the officers that he had seen CISNEROS wear the same or similar clothing at the apartment complex.

16. After speaking to the building manager, BHPD officers knocked on the door of the Apartment and CISNEROS opened the door. The officers identified CISNEROS based on previous booking photos and a driver license photo. Officers approached CISNEROS and took him into custody. The officers asked CISNEROS for consent to search the Apartment and the Camry, but CISNEROS declined to give consent.

17. Later that day, after CISNEROS was taken into custody, BHPD obtained state search warrants for the Apartment and the Camry. That evening, BHPD officers executed the search warrants. BHPD officers did not find anything of evidentiary value in the Camry. Before officers searched the Apartment, CISNEROS' father, A.C., arrived. A.C. told the BHPD officers that CISNEROS primarily resided in the living room of the Apartment. In the living room area, BHPD officers found a black zip up hooded sweatshirt, three pairs of black pants, a pair of black Nike shoes, a folding knife, three USPS keys, and miscellaneous mail and debit cards in names not associated with CISNEROS. Two of the USPS keys were Arrow keys. The first Arrow key had the serial number "31" inscribed on it. The second Arrow key had the serial number "78" inscribed on it. The third key was a key to a LLV. The two Arrow keys were

inscribed with the same serial numbers as the keys that were stolen from the USPS employee on April 22, 2022.

D. Interview of CISNEROS

18. BHPD officers arrested CISNEROS on the evening of April 27, 2022 and transported him to the Beverly Hills Police Department. Beverly Hills Police Department notified the United States Postal Inspection Service of the arrest and Postal Inspectors responded to the Beverly Hills Police Department to interview CISNEROS.

19. On April 28, 2022, at approximately 8:07 AM, law enforcement read CISNEROS his Miranda rights and CISNEROS signed an Advice of Rights form acknowledging that he understood his rights. Law enforcement asked CISNEROS where he was on Friday April 22, 2022. CISNEROS said he could not recall. Law enforcement told CISNEROS that they were investigating an armed robbery of USPS employee and they believed that he was the individual that committed the robbery. They showed CISNEROS two images from the video surveillance recording of the robbery. CISNEROS acknowledged that he was the individual shown in the surveillance committing the robbery. CISNEROS said that he saw the USPS employee and said "give me the keys." When the USPS employee gave him the USPS keys, CISNEROS said he ran back to the Camry, which was in an alley way. CISNEROS said the Camry belonged to A.C. CISNEROS said that he robbed the USPS employee to acquire the USPS keys and sell them for extra money. When law enforcement asked CISNEROS where he learned about the USPS keys, he stated that he watched a YouTube video that said if

someone stole the USPS keys and resold them, they could earn a significant amount of money. CISNEROS said the USPS keys that officers found in the Apartment were the keys he stole on April 22, 2022. In addition, CISNEROS said that the knife found in the Apartment belonged to him. CISNEROS said he did not intend to scare or hurt the USPS employee during the robbery.

V. TRAINING AND EXPERIENCE REGARDING MAIL, ARROW KEY AND IDENTITY THEFT

20. Based on my training and experience and information obtained from other law enforcement officers who investigate mail and identity theft, I know the following:

a. People who steal genuine and counterfeit United States Postal Service Arrow keys use the keys to access mailboxes and mail collection boxes to steal mail to further identity theft, access device fraud, and bank fraud schemes.

b. People who steal mail are often involved in fraud and identity theft crimes. These individuals usually steal mail looking for checks, access devices, other personal identifying information (such as names, Social Security numbers, and dates of birth), and identification documents that they can use to fraudulently obtain money and items of value. Mail thieves often retain these items of value from stolen mail in order to make fraudulent purchases or sell the items to others in exchange for cash or drugs.

VI. CONCLUSION

21. For all of the reasons described above, there is probable cause to believe that CISNEROS has committed a

violation of Title 18, United States Code, Section 2114(a)
(Robbery of United States Mail and Property).

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 29th day of
April, 2022.

A handwritten signature in blue ink, appearing to read 'Alka Sagar', is written over a horizontal line.

THE HONORABLE ALKA SAGAR
UNITED STATES MAGISTRATE JUDGE